

Ramon Rossi Lopez, CA Bar No. 86361
(admitted *pro hac vice*)
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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

IN RE BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

Case No. MD-15-02641-PHX-DGC

**APPLICATION TO SERVE AS LEAD
AND LIAISON COUNSEL AND
CHAIR OF PLAINTIFFS' STEERING
COMMITTEE**

Pursuant to this Court's Order Setting Initial Case Management Conference, dated September 15, 2015, paragraph 9, the undersigned, Ramon Rossi Lopez, founding and managing partner of Lopez McHugh LLP, submits this Application to serve as Co-Lead and Liaison Counsel for Plaintiffs, as well as the Chair of the Plaintiffs' Steering Committee, in the above-entitled Multidistrict Litigation, No. 2641 (hereinafter, "MDL No. 2641" and/or "this MDL"). An updated Curriculum Vitae ("CV") for Mr. Lopez, showing his experience and qualifications, has been attached for the Court's consideration to this Application.

I. INTRODUCTION

In accordance with the Court's criteria as outlined in its Order dated September 15, 2015 (Doc. 72), I, Ramon Rossi Lopez, request that the Court approve my service in the formal capacity of Co-Lead/Liaison Counsel for Plaintiffs in this MDL for the following reasons: my experience, qualifications, prior MDL positions, all of which is reflected in my CV, and, more importantly, the past four years of experience and dedication my firm, helmed by me, has spent engaged in extensive discovery and litigation activities—including one trial that settled after 11

1 days—in these cases that are the subject of MDL No. 2641, all of which will be set forth in
2 more detail, below, establish my credentials and merit in serving in these requested roles.

3 **II. WILLINGNESS AND ABILITY TO COMMIT TO THE CASE**

4 Lopez McHugh has a proven willingness to commit to what will be a time-consuming
5 process – a commitment best displayed by its previous four-year commitment to this litigation,
6 including, most recently, activities initiated, lead, directed and organized by Ramon Rossi
7 Lopez since the JPML assignment of this MDL.

8 Over the past four years, I have been actively litigating Bard IVC Filter cases in multiple
9 state and federal court venues throughout the country. We opened, and have been financing for
10 the past four years, the document depository for the products that are the subject of this MDL.
11 We also hired and have been financing over three years an ESI (Electronically-Stored
12 Information) consulting company to deal with the document productions. This depository and
13 these ESI consultants will continue to be available to both state and federal litigants.

14 Troy A. Brenes of my office conducted the original due diligence of this case, and has
15 spent the overwhelming majority of the past four years litigating these cases with me, as well as
16 approximately a dozen co-counsel firms – from client interviews, complaint filing, review and
17 coding of hundreds of thousands of pages of documents, corporate, expert and third-party
18 depositions, the retention of numerous experts, handling and submission of Rule 26 Reports,
19 law and motion practice, and acting as trial counsel. Mr. Brenes' experience, commitment and
20 participation in this litigation and other relevant cases have been recognized by other counsel
21 who will be submitting applications to serve on a Plaintiffs' Steering Committee slate.

22 For the past three years, this litigation has been my primary focus, passion and
23 commitment. Troy Brenes and I have taken the majority of corporate depositions during that
24 time period, as well as the majority of expert and treating health care provider depositions. We
25 have also retained and/or provided the majority of Rule 26 (and state-court equivalents) expert
26 reports in numerous cases, defended and cross-examined numerous experts in every relevant
27 discipline, filed and opposed *Daubert* challenges and Motions for Summary Judgment.
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1 Troy Brenes and I also acted as lead trial counsel, and the Lopez McHugh firm financed
2 the only case to have gone to trial over at least the past three years involving one of these
3 devices. That case was tried before the Honorable Robert C. Jones, in the United States District
4 Court, for the District of Nevada, in Reno, Nevada, for 10 consecutive court days when that
5 matter resolved before jury deliberations on day 11 of trial.

6 More recently, I was one of two attorneys who orally argued the petition for this MDL to
7 the JPML in July 2015, and the sole attorney who provided oral rebuttal and fielded all
8 questions from the JPML Panel regarding all points raised by defense counsel who were
9 opposing this MDL assignment, as well as additional questions raised by the Honorable Panel.

10 As described in more detail, below, I reached out to all counsel who expressed interest in
11 serving on a steering or management committee the same day the Court issued its Order on
12 September 15, 2105, to begin the organization and collaboration process among Plaintiffs'
13 attorneys. Within one week, all those with whom I have spoken reached a consensus regarding
14 leadership and committee structures for the plaintiffs. In the ensuing week, I circulated a list of
15 approximately 15 subcommittee categories, all of which are now populated with chairs and an
16 appropriate number of qualified contributing members, all of whom are working diligently and
17 cooperatively in advancing the involved issues. I have been and will continue to be actively
18 involved in each of these committees.

19 My firm represents over 150 plaintiffs with documented failures and injuries resulting
20 from all of the Bard IVC filter products that are the subject of this MDL. We are investigating
21 the merits of potentially representing another one hundred plaintiffs, approximately. Currently,
22 I am counsel of record for the following 12 plaintiffs whose cases have thus far been
23 transferred to this MDL: Susan Fox; Pamela B. Cason; Jennifer R. Coker; Debra Green;
24 Jessica Deserio-Mintz; John Murray and Melonee Murray; John Noonan; Erin Smith; Denise
25 O'Neil; Lessie Tillman; and Casey Wright.

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III. ABILITY TO WORK COOPERATIVELY WITH OTHERS

Ramon Rossi Lopez has been a practicing trial lawyer for 36 years. He and his firm have a track record of working together with other firms and lawyers around the country in these types of litigations, in a productive, efficient, respectful and inclusive manner. In fact, because of his known leadership qualities and the unique value he brings to these cases, Mr. Lopez and his firm are often sought by other plaintiffs' lawyers to co-counsel mass tort cases with this case being a clear example. Lopez McHugh LLP is co-counsel with approximately 10 other law firms who were originally retained by clients and filed (or, intend to file) a Bard IVC Filter case.

Personally, my ability to work cooperatively with others in this litigation, specifically, is supported by my prior commitment and role of leading, organizing, and jointly prosecuting these cases with a multi-firm consortium and co-counsel arrangements with several other firms, including maintaining and administering a joint common benefit fund. In anticipation of the potential for this assignment as Lead/Liaison Counsel, I initiated the organization of the attorneys and firms who had filed cases and/or discovered were going to be filing cases, and who would be seeking active leadership/committee roles in this litigation, whether assigned an MDL, or not. Since the assignment of MDL No. 2641 to this Court, I have led the effort to engage all attorneys and firms with federally-filed cases and initiated the organization of Plaintiffs' counsel, and sought their assistance and commitment in preparation of all of the matters set forth in the "Order Setting Initial (CMC)."

Since September 15, 2015, I have initiated and chaired several conference calls with attorneys and firms who have expressed an interest, and now a commitment, to serve on a Plaintiffs' Steering/Management Committee in this MDL. That number has grown from approximately 12 to 20. I have also initiated and chaired numerous conference calls with smaller groups of Plaintiffs' counsel who have been designated to work on various committees, prepare specific discovery, and engage in other projects Plaintiffs plan to initiate once the current discovery stay has been lifted. I created a list of categories of such projects and

1 submitted same to all 20 firms for input and participation. All of these subcommittees are now
2 occupied with chairs and an appropriate number of participants.

3 **IV. PROFESSIONAL EXPERIENCE IN THIS TYPE OF LITIGATION**

4 The professional experience Ramon Rossi Lopez has in this type of litigation is almost
5 unparalleled among Plaintiffs' lawyers in the United States. He and his law firms have
6 primarily focused on medical device and pharmaceutical mass tort litigations for the past 25
7 years. Mr. Lopez has experience at all levels of mass tort litigation. Although not all were in a
8 formal leadership role, the number of such complex, medical device/pharmaceutical cases in
9 which he has been involved is in excess of 30. The overwhelming majority of these were in a
10 leadership position in either, or both, MDL and/or statewide coordinated actions dating past 25
11 years of my 36-year professional career. For a detailed list of my past experience in similar
12 actions, as well as past experience in numerous Steering, Executive, and Management
13 Committees, Lead/Liaison positions, subcommittees, and articles and lectures by me involving
14 similar matters, I respectfully direct the Court's attention to my CV, which was updated days
15 prior to this submission and has been attached to this Application.

16 **A. Prior Noteworthy Roles in MDL and State Coordinated Actions**

17 In addition to my appointments as Lead/Liaison, and membership on Plaintiffs'
18 Executive, Steering and Management Committees in both state and federal courts over the past
19 25 years, I also served as Special Counsel and State-Federal Liaison Counsel to the Honorable
20 Michael Davis, in the United States District Court, for the District of Minnesota, in
21 Minneapolis, MN, in a pharmaceutical MDL, at his request. In that position I helped moderate
22 and coordinate joint discovery, including depositions taken over several weeks in Europe,
23 between state and federal litigants. Judge Davis consulted with me about various issues
24 throughout the course of that MDL proceeding. I relished the opportunity to serve in these
25 roles for Judge Davis.

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V. ACCESS TO RESOURCES TO ADVANCE LITIGATION IN A TIMELY MANNER

My law firm has access to sufficient resources to advance the litigation in a timely manner, which is best revealed by our involvement in past discovery activities, pre-trial and trial participation in at least 12 of these related cases, to date, advancing costs on behalf of those plaintiffs and scores of others up to, and in one instance, through an 11-day trial earlier this year. Moreover, Lopez McHugh has committed to this litigation, and will continue to do so in the future, the equivalent of four full-time attorneys, as well as three full-time paralegals, all of whom collectively have 100 years of experience in complex medical device and pharmaceutical mass tort products liability litigation. Lopez McHugh LLP has offices in California, Pennsylvania and New Jersey, and the primary emphasis in all three offices is litigating medical device and pharmaceutical products liability cases. Attorneys, certified paralegals and staff in all three offices will be available whenever needed throughout the course of this litigation.

Lopez McHugh has developed a secure electronic depository (separate and distinct from the corporate and third-party document depository), and is currently populating it with all of the common benefit and other work product we and others have developed over the past four years that will be made available to all participating Plaintiffs' counsel with either, or both, state and federal court cases, once appropriate safeguards and protections are in place. We intend to have that "live" and accessible by October 12, 2015. I can provide a detailed list of what this "library" will include to the Court *in camera*, if necessary, as the content contains a significant amount of material protected by the attorney work-product doctrine or other privileges.

Since the Initial CMC Order issued by this Court, a minimum of 95% of my professional time has been devoted to the items and issues set forth in said Order, as well as other important matters that will assist the Court and parties in fulfilling their roles and duties to the just, expedient, and thorough discovery and ultimate resolution of this matter.

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VI. SUPPORT OF OTHER ATTORNEYS

I was provided written authority from the majority of the law firms with filed cases in this matter, and received no objection from non-responders, to act as interim lead counsel in conducting the meet-and-confer discussions with defense counsel, as required by the Initial CMC Order. On one conference call, and during subsequent in-person meetings, those attorneys who seek leadership roles in this MDL unanimously endorsed me to seek and obtain this appointment as Co-Lead/Liaison Counsel. I was instrumental, per the Initial CMC Order, in investigating and finding a local Phoenix firm to commit to a leadership role in this MDL. That led us to the law firm of Gallagher & Kennedy, P.A., and a unanimous endorsement of that recommendation by each of the 20 firms who seek appointment to our Plaintiffs' Steering Committee.

While not required, and after defense counsel requested that this first meet and confer pursuant to the Initial CMC Order be conducted via conference call, I suggested that this meeting take place in person at the law offices of Gallagher & Kennedy in Phoenix, Arizona. Defense counsel agreed and this meeting took place on Thursday, October 1, 2015, during which I spoke on behalf of all Plaintiffs' counsel, several of whom were present at the meeting and others via conference line. All attorneys and/or their co-counsel were invited to participate in this initial meeting either in person, or via conference call.

In addition to the joint meeting with opposing counsel on October 1, I organized and participated in further organizational and strategy meetings with other Plaintiffs' attorneys, in Phoenix, on September 30, October 1 and October 2, 2015. Since that time, I have contributed to drafting the joint statement resulting from these meetings with counsel, and have kept all others informed of the progress, drafts and work product that will make up our Agenda and Joint Submission to the Court, due October 9, 2015. My office and others prepared the final Plaintiffs' position statement and proposals that will be submitted to this Court on October 9, 2015, jointly, with counsel for Defendants.

The Protective Order that will be adopted and applicable in this MDL Proceeding, normally an issue that consumes several weeks of negotiations, and oftentimes submission to

1 the Court for resolution, was one previously negotiated with defense counsel by my office and
2 co-counsel.

3 **VII. CONCLUSION**

4 I respectfully request that this Court accept my Application to serve as Co-Lead and
5 Liaison Counsel with Mr. Robert Boatman of Gallagher & Kennedy, P.A., as well as Chair of
6 the Plaintiffs' Steering Committee, in this MDL No. 2641. Mr. Boatman and I have been
7 working collaboratively with each other over the past several weeks in organizing and
8 advancing the many aspects of this case that will need to be addressed and accomplished in this
9 MDL proceeding. Our respective attorney and paralegal staffs have also been working closely
10 and collaboratively with each other and with other firms on such matters. It is clear that Mr.
11 Boatman and I, as well as the members of our two firms, will have a collaborative, beneficial,
12 cooperative, respectful and committed relationship with each other, as well as with all other
13 Plaintiffs' counsel involved in this litigation.

14 As in every case in which I am involved, I am fully committed to working cooperatively,
15 respectfully and diligently with the Court, Opposing Counsel and all litigants and Attorneys
16 representing plaintiffs in this action, to its end.

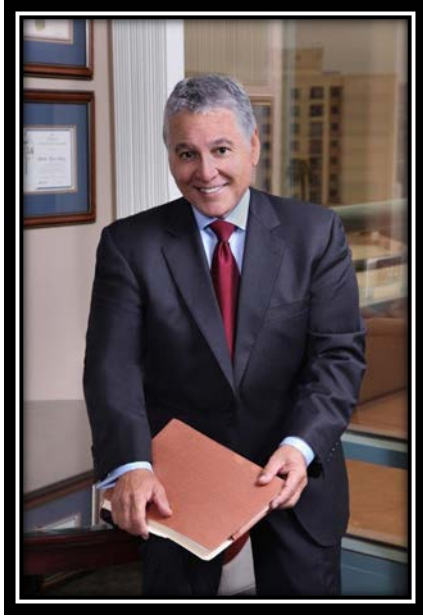
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18 RESPECTFULLY SUBMITTED this 9th day of October, 2015.

19 LOPEZ McHUGH LLP

20
21 By: 

22 Ramon Rossi Lopez
23 100 Bayview Circle, Suite 5600
24 Newport Beach, CA 92660
25 *Attorneys for Plaintiffs*
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**RESUME OF EDUCATION, EXPERIENCE, CAREER AND
ACCOMPLISHMENTS
OF
RAMON ROSSI LOPEZ
Attorney at Law**



RAMON ROSSI LOPEZ

Attorney at Law



EDUCATION

Loyola Law School, J.D., 1978

Loyola University of Los Angeles, B.S., 1972

BAR & COURT ADMISSIONS

California, 1979

U.S. District Court, Central District of California, 1979

U.S. District Court, Southern District of California

U.S. District Court, Northern District of California

U.S. District Court, Eastern District of California

U.S. District Court, Southern District of New York

U.S. District Court, District of Washington

U.S. District Court, Northern District of Ohio

U.S. District Court, Eastern District of Pennsylvania

U.S. District Court, District of Minnesota

U.S. District Court, Northern District of Alabama

U.S. District Court, Southern District of Illinois

U.S. District Court, Southern District of South Carolina

U.S. District Court, Southern District of Indiana

U.S. Court of Appeal, 3rd Circuit

U.S. Court of Appeal, 5th Circuit

U.S. Court of Appeal, 6th Circuit, 2001

U.S. Court of Appeal, 9th Circuit

Pro Hac Vices granted in the following states' courts: NJ, PA, FL, MS, OH, IL

District of Columbia (Approved, pending swearing)

PROFESSIONAL BACKGROUND

LOPEZ McHUGH LLP, 2007-Present
Managing and Founding Partner

LOPEZ, HODES, RESTAINO, MILMAN & SKIKOS, 1988-2006
Managing and Founding Partner

BARTH, LOPEZ & HODES, 1982-1987
Managing and Founding Partner

CUMMINS, WHITE, ROBINSON & ROBINSON, 1979-1981
Associate Attorney

Plaintiff's Personal Injury Practice with emphasis on:

- Mass Tort Litigation
- Pharmaceuticals, Medical Devices and Other Products Liability
- Medical and Other Professional Negligence
- Insurance Bad Faith
- Wrongful Termination and Employment Discrimination
- Vehicular Accidents and Automotive Defects
- Consumer Fraud
- Construction Accidents and Construction Defects
- HMO Litigation
- Nursing Home and Elder Abuse
- Environmental Law and Toxic Torts

AWARDS/ACCOLADES

- 2013 Hall of Fame Inductee – St. Patrick-St. Vincent High School
- American Academy of Barristers
- The Best Lawyers in America, 2006-2015
- Lawdragon Top 500 in America, 2006-2015
- OCTLA "Top Gun: Award, Mass Torts/Product Liability, 2004
- Southern California Super Lawyers for The Family and Consumer, 2007
- Super Lawyers, Orange County, 2004-2015
- Super Lawyers, Southern California, 2006-2015
- Top Lawyers In Orange County, 2006-2015
- American Academy Of Barristers, Fellow, 2003 (Life Member)
- Top 100 Trial Lawyers, The National Trial Lawyers, 2007-2015
- Register of Preeminent Professionals, 1994-2015
- Martindale Hubbell, AV Rating, 1994-2015

PROFESSIONAL ASSOCIATIONS

- American Bar Association
- Consumer Attorneys of California (CAOC)
- American Association for Justice (AAJ)
- Orange County Trial Lawyers Association (OCTLA)
- Orange County Bar Association (OCBA)
- Orange County Barristers
- Consumer Attorneys of Los Angeles (CAOC)
- Legion Lex (Orange County Chapter)
- Western Trial Lawyers Association (WTLA)
- National Trial Lawyers
- Trial Lawyers for Public Justice (TLPJ)

OTHER PROFESSIONAL ACTIVITIES

- National Wildlife Federation – President’s Council (2008-2012); Board of Directors (2013-Present)
- Moot Court Judge – Loyola Law School
- Arbitrator – Various Kaiser and other contractual arbitrations
- Judge *pro tem* – Orange County Superior Court
- Arbitration Panel – Orange County Superior Court
- Inns of Court – Orange County Chapter
- Kaiser Party Arbitrator
- The Apollo Alliance – Board Member
- Expert Witness – Professional Responsibility; Common Benefit Fee Criteria; Insurance Bad Faith

REPRESENTATIVE COMPLEX CASES AND MASS TORT LITIGATIONS

- **MGM FIRE LITIGATION**
 - Represented 25 victims, participated in MDL activities, obtained favorable resolution
- **PAN AM-LOCKERBIE AIR CRASH**
 - Represented family of three victims of the Pan American-Lockerbie Air Crash, MDL No. 799
- **HALLIBURTON/KBR CONVOY LITIGATION**
 - Represented seven families for wrongful death of loved ones and 11 injured victims of a Halliburton/KBR convoy attack after intentionally and needlessly being deployed into the line of fire during the Iraq War in 2004. (Case consolidated in USDC, Houston, TX)
 - Two Circuit Court of Appeal decisions
- **SILICONE BREAST IMPLANT LITIGATION**
 - Represented 500 women in state and federal courts
 - Member of Plaintiffs’ Steering Committee (PSC) for the California Judicial Counsel Coordination Proceedings (JCCP)

- Co-Chair of Science Subcommittee for the California JCCP
- Member of PSC for MDL proceedings coordinated in the USDC, for the Northern District of Alabama
- Participated in negotiations and resolution of numerous cases
- **SHILEY HEART VALVE LITIGATION**
 - Represented foreign country recipients in individual and class action lawsuits
- **SYNTHROID MARKETING LITIGATION (MDL No. 1182)**
 - Lead Counsel in the California MDL Class Action proceedings coordinated in the USDC, for the Central District of California
 - Member of PSC
 - Lead Counsel for commercial claimants
- **LATEX LITIGATION**
 - Member of PSC in MDL proceedings coordinated in the USDC, for the Eastern District of Pennsylvania
 - Affiliated with Oregon-based firm
- **DIET PILL (FEN-PHEN) LITIGATION**
 - Member of PSC in MDL proceedings coordinated in the USDC, for the Eastern District of Pennsylvania
 - Member of Discovery Subcommittee in MDL proceedings
 - Member of Plaintiffs' Executive Committee (PEC) for the California JCCP
 - Negotiated coordination between federal MDL and state court actions in California, Florida, Nevada and Oregon
 - Invited Member of Global Settlement Negotiations Team
 - Chair of Phentermine Discovery Committee
 - Lead Trial Counsel in cases in California and Mississippi
 - Negotiated settlements for 2,000+ plaintiffs from various states, and for multiple firms
- **REZULIN LITIGATION (MDL No. 1348)**
 - One of four Members of PEC in MDL proceedings coordinated in the USDC, for the Southern District of New York.
 - Co-Lead Counsel in MDL proceedings
 - Lead Counsel or co-counsel in approximately 100 individual plaintiffs' cases in more than 10 states with confirmed liver damage or death
 - Member of State Court PSC
 - Firm filed first Petition for MDL Coordination
 - Invited speaker to first ATLA/NCA/Maeley's Rezulin conferences
- **PPA LITIGATION**
 - Member of PSC in MDL proceedings coordinated in the USDC, for the Western District of Washington
 - Co-Lead Counsel and Member of PEC for the California JCCP (No. 4166)
 - Member of Discovery, Experts and Science Subcommittees
 - Chair, Mealey's Litigation Conferences (March 2001 and August 2001)

- Member of Common Benefit Fees and Costs Allocation Committee
- Co-Lead Trial Counsel, First Bellwether Case

- **BAYCOL LITIGATION**

- State-Federal Liaison Counsel, Special Advisor and Consultant to the Honorable Michael J. Davis in MDL proceedings coordinated in the USDC, for the District of Minnesota, by appointment
- Member of PSC in MDL proceedings
- Co-Lead and Co-Liaison Counsel in the California JCCP
- Member of Discovery Subcommittee, focus on foreign defendants (depositions in Amsterdam)
- coordinated in the USDC, for the District of Minnesota, as well as in the California State Coordinated Actions

- **MTBE LITIGATION**

- Co-Lead Counsel with District Attorney of Orange County (People v. ARCO, Shell, et al.)

- **ZYPREXA LITIGATION**

- Member and Organizer of PSC in MDL proceedings coordinated in the USDC, for the Southern District of New York
- Chair of the Discovery Subcommittee in MDL proceedings
- Member of Science and Experts Subcommittee
- Member of Law and Research Subcommittee
- Member (Co-Chair) of Global Settlement Negotiations Committee
 - Successful Global Settlement of 8,000 pending cases (\$700,000,000.00)
- Chair of Transition Team to New PSC
- Co-Chair of ATLA Litigation Group
- Co-Chair of Common Benefit Fees and Costs Allocation Committee

- **VIOXX LITIGATION**

- Member of PSC and Discovery Subcommittee in MDL proceedings coordinated in the USDC, for the Eastern District of Louisiana
- Co-Chair of AER Discovery Project
- Moderator of ATLA Mock Trial

- **GUIDANT MEDICAL DEVICE LITIGATION**

- Member of PSC in MDL proceedings coordinated in the USDC, for the District of Minnesota
- Member of ADR/Negotiations Committee
- Lead and Liaison Counsel for the interests of 25 law firms in Common Benefit Fees and Costs Assessments

- **ORTHO EVRA LITIGATION**

- Member of PSC in MDL proceedings
- Member of Lead Counsel Committee

- Member of Discovery Subcommittee
- **KETEK LITIGATION**
 - Lead Trial Counsel and Liaison Counsel in New Jersey State Coordinated Actions
 - Chair of Private Litigation Group
 - Chair of Negotiations Committee
- **GADOLINIUM LITIGATION**
 - State-Federal Liaison Counsel in MDL proceedings coordinated in the USDC, for the Northern District of Ohio
 - Member of PSC in MDL proceedings and the California JCCP
 - Member of Discovery Subcommittees as to Defendants Bayer and GEHC
 - Co-Chair of Discovery Subcommittee as to Defendant Mallinckrodt
 - Represented more than 100 NSK plaintiffs in state and federal courts
- **CHANTIX LITIGATION**
 - One of four Members of PEC in MDL proceedings coordinated in the USDC, for the Northern District of Alabama
 - Trial Counsel for Bellwether Trial
 - Member of Experts Subcommittee and Experts Depositions Team
 - Settlement Counsel for over 200 plaintiffs
 - Member of Common Benefit Fees and Costs Allocation Committee
- **PRADAXA LITIGATION**
 - State-Federal Liaison Counsel and Member of PSC in MDL proceedings coordinated in the USDC, for the Southern District of Illinois
 - Co-Chair of Discovery Subcommittee in MDL proceedings
 - Lead and Liaison Counsel for the California JCCP
 - Sponsor and Speaker, First National Seminar, AAJ
 - Settlement Negotiations Committee
- **LIPITOR LITIGATION**
 - One of four Members of PSC in MDL proceedings coordinated in the USDC, for the District of South Carolina
 - Co-Chair of American Association for Justice (AAJ) Litigation Group
 - Co-Chair of *Ad Hoc* Discovery and Expert Committee
 - Speaker, AAJ Seminar, Philadelphia, PA, Sept. 2013
 - Member of Bellwether Trials Subcommittee
 - Member of Experts and Science Subcommittee
- **INCRETINS LITIGATION**
 - Member of PSC in MDL proceedings coordinated in the USDC, for the Southern District of California
 - Member of Discovery and Experts Subcommittees in MDL proceedings

- Lead Deposition Examiner
- Co-Chair for AER/Pharmacovigilance Discovery Project
- **GRANUFLO LITIGATION**
 - Bellwether Trial Counsel
 - Overseas members of firm who serve on Discovery and Expert Subcommittees
 - Lead Deposition Examiner
- **COOK IVC FILTERS LITIGATION**
 - Member of PSC in MDL proceedings coordinated in the USDC, for the Southern District of Indiana
 - Member of Discovery and Experts Subcommittees
 - Member of Bellwether Trials Subcommittee
- **BARD IVC FILTERS LITIGATION**
 - Awaiting decision by the Court as to requested appointments of several leadership roles in newly-formed MDL proceedings in the USDC, for the District of Arizona
 - Application pending for Chair of 20-person PSC in MDL proceedings
 - Application pending for Co-Lead and Liaison Counsel for Plaintiffs in MDL proceedings
 - Lead Trial Counsel – Reno, Nevada (Jan./Feb. 2015)
 - Organizer and Chair of Private Litigation Group
 - Lead Trial Counsel – CA, AZ, GA and NV
 - State-Federal Court Liaison Counsel (prior to MDL)
 - Medical Monitoring Class Actions – CA, PA and FL
 - Co-Chair of Private Litigation Group Discovery Committee (prior to MDL)

PUBLICATIONS/PRESENTATIONS/ INVITED SPEAKING ENGAGEMENTS

- “BRIDGING THE GAP” – Seminar for new bar members
- “CURRENT DEVELOPMENTS IN MEDICAL MALPRACTICE” – Annual Symposium of Orange County Podiatric Society
- “DISCOVERY STRATEGY” – The Orange County Chapter of Legion Lex
- “WHY SUE THE IMPLANTING PHYSICIAN” – National Breast Implant Symposium
- “TRYING A BREAST IMPLANT CASE” – California Trial Lawyers Association
- “AVOIDING LIABILITY AS A PRIMARY CARE PHYSICIAN OF PATIENTS WITH BREAST IMPLANTS” – The 5th Annual Breast Cancer Symposium
- “CURRENT LITIGATION TRIAL STRATEGY IN SUING 3M” – ATLA/BILG Seminar, Dallas, Texas, October 1996
- “HOW TO SURVIVE A SCORCHED-EARTH DEFENSE” – Consumer Attorneys of California, Winter Convention, April 1997
- “IMPORTANCE OF RADIOLOGY EVIDENCE IN BREAST IMPLANT LITIGATION” – ATLA/BILG Seminar, Las Vegas, April 1997

- "TORT TRENDS INTO THE 21st CENTURY" – CEB, 1997
- "MEDICAL LITERATURE AND EXPERT DATABASE/LIBRARY" – ATLA, JULY 1997
- "CHALLENGING A JUDGE FOR CAUSE" – CAOC, March 1998
- "DAUBERT - FROM THE PLAINTIFF'S PERSPECTIVE" – OCBA, SEPT. 1998
- "DIET PILL LITIGATION - ADVANCED COURSE II" – WTLA, Seminar Moderator and Speaker, December 1998
- MDL-1203 Discovery Seminar Organizer and Co-Chair – June 1999 / September 1999
- FEDERAL MDL No. 1203 (Diet Drugs/Fen-Phen) TRIAL PACKAGE SEMINAR – Lecture on Motions in Limine and Trial Illustrations, Las Vegas, March 2000
- MEALEY'S FEN-PHEN CONFERENCE – "The MDL Trial Package and Generic Expert Witnesses, West Palm Beach, Florida, March 2000.
- FEDERAL MDL No. 1203 – TRIAL SEMINAR, Santa Fe, New Mexico, May 2000.
- MEALEY'S FEN-PHEN CONFERENCE – Motions in Limine, Marina del Rey, California, June 2000
- DEPOSITION DO'S AND DON'TS – "The Gavel" OCTLA Magazine
- FEDERAL MDL No. 1203 – MOCK TRIAL SEMINAR – New Orleans, LA, Aug. 2000
- CAOC CONVENTION – Chair of Mass Tort Seminar, Monterey, CA, Nov. 2000
- MEALEY'S REZULIN CONFERENCE – "The Learned Intermediary Doctrine" – Phoenix, AZ, October 2000.
- 5th ANNUAL DRUG AND MEDICAL DEVICE CONFERENCE – "The Plaintiff's Case", New York City, NY, December 2000
- PPA LITIGATION GROUP – Chair and Sponsor, Organization of National Plaintiffs' Firms and Seminar, Newport Beach Four Seasons, Jan./Feb. 2001,
- ATLA WINTER CONVENTION – New Orleans, LA, Feb. 10-14, 2001
- PPA/EPHEDRA – MEALEY'S CONFERENCE, Co-Chair, Philadelphia, PA, March, 2001
- ATLA SUMMER CONVENTION – Montreal, Canada, July 14-18, 2001; PPA MDL PSC Co-Chair Meetings and Seminars
- REZULIN MDL DISCOVERY SEMINAR, Co-Chair, Pensacola, FL, August 2001
- PPA/EPHEDRA – 2ND MEALEY'S CONFERENCE, Co-Chair, San Diego, CA, AUGUST 16-17, 2001
- MEALEY'S REZULIN LITIGATION CONFERENCE, Phoenix, AZ, April 22-23, 2002, The Introduction of Scientific Evidence and Expert Testimony in Federal and State Court
- ALI-ABA LONDON PROGRAM – United State Domestic and International Litigation and Dispute Resolution: *Current Developments and Their Impact on U.S. and European Companies, Insurers and Lawyers*, April 10-12, 2002, London, England, Invited Speaker
- MEALEY'S PPA AND EPHEDRA CONFERENCE, San Diego, CA, August 1-2, 2002, Co-Chair, Presentation on MDL status; Co-Chair MDL PSC Meetings
- MASS TORTS MADE PERFECT, Las Vegas, January 16-17, 2003, How to develop a pharmaceutical case from due diligence to conclusion

- DEFENSE STRATEGIES FOR PHARMACEUTICAL AND MEDICAL DEVICE LITIGATION, Phoenix, AZ, February 3-4, 2003
- MEALEY'S FEN-PHEN CONFERENCE, March 13-18, 2003, Speaker and Panel Member
- CAOC CONVENTION, Monterey, CA, April 10-13, 2003
- MEALEY'S EPHEDRA CONFERENCE, Pasadena, CA, April 28-30
- MEALEY'S BAYCOL CONFERENCE, Florida, June 2-3, 2003
- ATLA SUMMER CONVENTION, San Francisco, CA, July 20-22, 2003; Co-Chair Rezulin MDL PSC Meeting
- EPHEDRA SUMMIT MEETING, August 12, 2003
- CAOC CONVENTION, Las Vegas, NV, September 5-6, 2003
- ABA CLASS ACTIONS SEMINAR, October 24, 2003
- MASS TORTS MADE PERFECT, New Orleans, LA, November 6-7, 2003
- MEALEY'S PARALEGAL SEMINAR, Los Angeles, CA, November 18, 2003, Speaker: developing a new mass tort
- ACI DRUG AND MEDICAL DEVICE CONFERENCE, New York, NY, Dec. 14-16, 2003, Panel speaker
- ATLA WINTER CONVENTION, Orlando, FL, Sept. 16-18, 2004; Welding Rods Litigation Group meeting; Begin development of Zyprexa Litigation Group
- MEALEY'S WELDING RODS CONFERENCE, Las Vegas, NV, March 11-12, 2004 OCTLA Seminar, March 13, 2004
- MASS TORTS MADE PERFECT, San Francisco, CA, March 18-19, 2004, Speaker: Zyprexa
- MEALEY'S EPHEDRA AND PPA CONFERENCE, San Diego, CA, May 10-11, 2004, Panel member
- ATLA WINTER CONVENTION, Boston, MA, July 3-7, 2004, Zyprexa PSC meetings, TLPJ
- HRT MDL MOCK TRIAL, Las Vegas, NV, October 1-2, 2004
- MASS TORTS MADE PERFECT, Las Vegas, NV, November 11-12, 2004
- ACI DRUG AND MEDICAL DEVICE – A NEW STANDARD FOR MASS TORT LITIGATION, New York, NY, December 12-14, 2004, Panel member: 360 Degrees of Insight into Baycol
- MEALEY'S VIOXX CONFERENCE, Philadelphia, PA, January 20-21, 2005
- ATLA WINTER CONVENTION, Palm Springs, CA, January 29-February 2, 2005, Litigation at Sunrise, speaker, Zyprexa Litigation
- PEPPERDINE LAW SCHOOL SYMPOSIUM – Emerging Issues in Preemption of Medical Drugs, Malibu, CA, April 9, 2005, speaker panel
- PPA MDL TRIAL PREP SEMINAR, Dallas, TX, April 12, 2005
- ATLA VIOXX MOCK TRIAL, New Orleans, LA, May 19-20, 2005, Moderator
- ATLA SUMMER CONVENTION, Toronto, Canada, July 20-27, 2005; Chair, Zyprexa Litigation Group meeting; Chair Zyprexa MDL PSC/DC meetings
- ATLA HEART DEVICE LITIGATION, Las Vegas, NV, September 15, 2005; Speaker: Potential Liability of Third Party Suppliers

- ATLA SEMINAR – TRENDS AND HOT TOPICS IN PHARMACEUTICAL LITIGATION, Las Vegas, NV, September 16-17; Moderator
- ATLA SEMINAR – MASS TORT LITIGATION, Las Vegas, NV, November 2006: Speaker: Zyprexa Litigation, Settlement and Litigation Status, Liability Case.
- ATLA SEMINAR – PHARMACEUTICAL LITIGATION, Miami, FL, February 2007, The Impact of the Drug Sales Representative on Your Case
- ATLA SUMMER CONVENTION, Chicago, IL, July 2007, Ethical Considerations in the Resolution of Mass Tort Cases
- MASS TORTS MADE PERFECT, Las Vegas, NV, November, 2007, SSRI Birth Injuries; Ketek Litigation
- AAJ BIG PHARMA CONFERENCE, Las Vegas, NV, February, 2008, Winning in Settlement Negotiations: the How and When For Success
- AAJ GADOLINIUM LITIGATION GROUP MEETING, Las Vegas, NV, February, 2008, State-Federal Coordination
- MEALEY'S PHARMACEUTICAL LITIGATION SUPER CONFERENCE, Chicago, IL, Jun2, 2008, Chair of 3 day conference; Ketek Litigation presentation.
- MASS TORTS JUDICIAL FORUM with HB and Honorable Marina Corodemus, Philadelphia, PA, June 2011, Panel member and presenter
- AAJ PRADAXA SEMINAR, Baltimore, MD, April, 2012, Speaker – Foreign Regulatory Activity
- IVC LITIGATION SEMINAR, Philadelphia, PA, August, 2012, Chair
- AAJ LIPITOR LITIGATION GROUP, Organizational Meeting, San Francisco, CA, July 2013
- AAJ MEDICAL DEVICE AND PHARMACEUTICAL CONFERENCE, Speaker, Lipitor Litigation, September 2013
- AAJ LIPITOR LITIGATION GROUP, Co-Chair and Presenter at Lipitor Litigation Group Meeting, New Orleans, LA, February, 2014
- AAJ Annual Convention, Miami, FL, 2014, Speaker – Deposing the Difficult Witness
- HARRIS MARTIN SEMINAR, San Francisco, CA, July, 2015, Speaker – IVC Filters Litigation
- AAJ Webinar, Moderator and Speaker, August, 2015 – Bard IVC Filters Litigation
- MTMP Seminar, October, 2015, Moderator and panel member – Mediation, Settlement Considerations, Ethics, Format, Timing, Terms and Conditions